

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF ARKANSAS  
TEXARKANA DIVISION**

**GLORIA BRADFORD, Individually and as Class Representative on Behalf of All Similarly Situated Persons; NED BURNETT, JR., Individually and as Class Representative on Behalf of All Similarly Situated Persons; SAMUEL ALEXANDER, Individually and as Class Representative on Behalf of All Similarly Situated Persons; BOOKS, ETC., by and through GLORIA BRADFORD, Class Representative on Behalf of All Those Similarly Situated; and STELLA PATRICIA SMITH, Individually and as Class Representative on Behalf of All Similarly Situated Persons,**

## Plaintiffs

**VS.**

**UNION PACIFIC RAILROAD,  
A Delaware Corporation,**

## Defendant

**CAUSE NO. 4:05-cv-4075 HFB**

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE  
TO PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

**COMES NOW** Defendant Union Pacific Railroad Company, and for its Unopposed Motion for Extension of Time to File Response to Plaintiffs’ Motion for Class Certification, would state as follows:

1. Plaintiffs filed their Motion for Class Certification on June 30, 2006.

2. Defendant is in need of additional time to respond to Plaintiffs' Motion for Class Certification because of the necessity to complete class representative discovery prior to the preparation and filing of Defendant's response.

3. Plaintiffs and Defendant have agreed to the scheduling of class representative depositions in this cause on August 8-10, 2006.

4. Plaintiffs have agreed to the relief requested in this motion, and to an extension of time for filing Defendant's response to Plaintiffs' Motion for Class Certification to and including August 18, 2006.

WHEREFORE, PREMISES CONSIDERED, Defendant Union Pacific Railroad Company respectfully requests this Court to grant this Unopposed Motion for Extension of Time to file Response to Plaintiffs' Motion for Class Certification, to and including August 18, 2006, and for such further relief as the Court shall deem appropriate.

Respectfully submitted,

/s/ Sean F. Rommel

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**ATTORNEYS FOR DEFENDANT  
UNION PACIFIC RAILROAD COMPANY**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served upon all known counsel of record in the above action by electronic filing on this 14th day of July, 2006.

/s/ Sean F. Rommel  
Sean F. Rommel